

**WILSON ELSE MOSKOWITZ EDELMAN & DICKER, LLP**

Andrew J. Heck, Esq. (AH9361)

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Attorneys for Defendants, John's Lock Shop, Inc. d/b/a Houdini Lock and Safe Company and Thomas Guille

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

**CAMDEN**

_____	:	Civil Action No.
BRENDA BROWN,	:	Hon. _____
	:	
Plaintiff,	:	
	:	<u>Civil Action</u>
v.	:	
JOHN'S LOCK SHOP, INC., d/b/a HOUDINI	:	<b>NOTICE OF REMOVAL OF A</b>
LOCK AND SAFE COMPANY, THOMAS	:	<b>CIVIL ACTION</b>
GUILLE, JOHN DOES, 1 through 100,	:	
inclusive, fictitious named Defendants and JACK	:	
DOES, 1 through 100, inclusive, fictitious named	:	
Defendants jointly, severally and/or in the	:	
alternative,	:	
	:	
Defendants.	:	
	:	
_____	:	

TO: THE JUDGES OF THE UNITED STATES DISTRICT COURT FOR THE DISTRICT  
OF NEW JERSEY:

**PLEASE TAKE NOTICE**, that pursuant to 28 U.S.C. § 1446(a), Defendants, John's Lock Shop, Inc. d/b/a Houdini Lock and Safe Company and Thomas Guille (hereinafter "Defendants"), by and through the undersigned attorneys, Wilson Elser Moskowitz Edelman & Dicker, LLP, on this date have filed this Notice of Removal of a Civil Action from the Superior Court of New

Jersey, Law Division, Camden County, Docket No. CAM-L-2205-22, to the United States District Court for the District of New Jersey, together with all process, pleadings, and Orders, as required by 28 U.S.C. § 1446(a), copies of which are attached hereto and made part hereof, respectfully shows:

1. Plaintiff, Brenda Brown (hereinafter, “Plaintiff”), filed a Complaint on August 25, 2022, (the “Complaint”), commencing a personal injury action in the Superior Court of New Jersey, Law Division, Camden County, Docket No. CAM-L-2205-22, entitled *Brown v. John’s Lock Shop, Inc., et al.*, (the “Action”). A true and correct copy of Plaintiff’s Complaint is annexed hereto as **Exhibit A**.

2. The Complaint names John’s Lock Shop, Inc. d/b/a Houdini Lock and Safe Company, and Thomas Guille as defendants (Exhibit A).

3. The Action is alleged to arise out of an October 11, 2020 motor vehicle accident involving Plaintiff and Defendant, Thomas Guille, acting as the agent, servant and/or employee with the express and/or implied permission of its owner, Defendant John’s Lock Shop, Inc. d/b/a Houdini Lock and Safe Company, which caused Plaintiff to sustain bodily injuries (Exhibit A).

4. According to the Complaint, Plaintiff, Brenda Brown, is a resident of the State of New Jersey (Exhibit A).

5. Defendant, Thomas Guille, is an individual and a resident of the State of Pennsylvania.

6. Defendant John’s Lock Shop, Inc. d/b/a Houdini Lock and Safe Company is a Pennsylvania corporation, with a principal place of business in Abington, Pennsylvania.

7. For purposes of diversity jurisdiction, a corporate party is a citizen of both its state of incorporation and the state in which its principal place of business is located. *Hertz Corp. v. Friend*, 559 U.S. 77 (2010).

8. Pursuant to 28 U.S.C. §1446(b), Notice of Removal “shall be filed within thirty days after the receipt by the defendant, through service or otherwise, of a copy of the initial pleading setting forth the claim for relief upon which such action or proceeding is based . . . .”

9. Defendants received a copy of the Summons and Complaint on August 24, 2022.

10. Defendants have yet to be properly served.

11. Accordingly, this Notice of Removal is timely filed regardless of status of service.

12. Plaintiff alleges the subject motor vehicle incident “caused [Plaintiff] to suffer severe and painful bodily injuries which have in the past and will in the future cause her great pain and suffering and have required her to incur medical treatment and expenses and have caused her a diminishment and loss of earning capacity and quality of life... including but not limited to permanent loss of use of a body organ, member, function or system; permanent consequential limitation of use of a body organ or member.” (Exhibit A).

13. To date, Plaintiff has not agreed to cap any damages at \$75,000 and, therefore, coupled with the injuries alleged, the amount in controversy in this matter is in excess of \$75,000.

14. This action is one in which this Court has original jurisdiction under the provisions of 28 U.S.C. § 1332(a) in that the matter in controversy is between citizens of different states and involves alleged damages in excess of \$75,000.

15. Defendants have also filed copies of this Notice with the Clerk of the Superior Court of New Jersey, Law Division, Camden County, to perfect the removal of this action to the

United States District Court pursuant to 28 U.S.C. § 1441 and U.S.C. § 1446(b). A true and exact copy of the Notice of Filing, without exhibits, filed with the Superior Court of New Jersey is annexed hereto as **Exhibit B**.

**WHEREFORE**, Defendants pray that given that the statutory requirements having been met, that the above-captioned action now pending in Superior Court of New Jersey, Law Division, Camden County, be removed therefrom to this Court.

**WILSON, ELSER, MOSKOWITZ, EDELMAN & DICKER LLP**  
Attorneys for Defendants, John's Lock Shop, Inc. d/b/a Houdini Lock and  
Safe Company and Thomas Guille

By: /s/ Andrew J. Heck  
Andrew J. Heck. (AH9361)  
[Andrew.Heck@wilsonelser.com](mailto:Andrew.Heck@wilsonelser.com)

Dated: September 20, 2022

**CERTIFICATE OF SERVICE**

I hereby certify that on behalf of Defendants, John's Lock Shop, Inc. d/b/a Houdini Lock and Safe Company and Thomas Guille, I caused the within Notice of Removal to be filed with the United States District Court on this date.

Clerk, United States District Court  
Mitchell H. Cohen Building & U.S. Courthouse  
4th & Cooper Streets Room 1050  
Camden, NJ 08101

I further certify that a copy was sent via Electronic Filing to:

Clerk  
New Jersey Superior Court  
Camden County Hall of Justice  
101 S. 5th St.  
Camden, NJ 08103

Michael Sussen, Esq.  
Vincent J. Ciecka, PC  
P.O. Box 560  
5709 Westfield Avenue  
Pennsauken, NJ 08110  
Attorneys for Plaintiff

I further certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

**WILSON, ELSER, MOSKOWITZ, EDELMAN & DICKER LLP**  
Attorneys for Defendants, John's Lock Shop, Inc. d/b/a Houdini Lock and  
Safe Company and Thomas Guille

By: /s/ Andrew J. Heck  
Andrew J. Heck. (AH9361)  
[Andrew.Heck@wilsonelser.com](mailto:Andrew.Heck@wilsonelser.com)

Dated: September 20, 2022

# EXHIBIT A

VINCENT J. CIECKA, P.C.  
By: Michael Sussen, Esquire  
Attorney I.D. #023431987  
P.O. Box 560  
5709 Westfield Avenue  
Pennsauken, NJ 08110  
(856) 665-5709  
Attorney for Plaintiff(s)

BRENDA BROWN,	:	SUPERIOR COURT OF NEW JERSEY
	:	CAMDEN COUNTY
	:	LAW DIVISION
Plaintiff,	:	
	:	
vs.	:	Docket No.
	:	
JOHN'S LOCK SHOP, INC., d/b/a	:	Civil Action
HOUDINI LOCK AND SAFE	:	COMPLAINT AND DEMAND
COMPANY, THOMAS GUILLE, JOHN	:	FOR JURY TRIAL
DOES, 1 through 100, inclusive, fictitious	:	
named Defendants and JACK DOES, 1	:	
through 100, inclusive, fictitious named	:	
Defendants jointly, severally and/or in the	:	
the alternative,	:	
	:	
<u>Defendants</u>	:	

The Plaintiff, Brenda Brown, residing at 37 Meadowrue Lane in Sicklerville, Winslow Township, County of Camden and State of New Jersey, by way of Complaint against the Defendants, says:

**FIRST COUNT**

1. On or about October 11, 2020, the Plaintiff, Brenda Brown, was the owner and operator of a motor vehicle who was stopped at the exit to the parking lot of Auto Zone waiting for traffic to clear to safely enter onto Chews Landing Road in the Township of Winslow, County of Camden and State of New Jersey.

2. At the aforesaid time and place, the Defendant, Thomas Guille, was operating a commercial vehicle, owned by the Defendant, John's Lock Shop, Inc. d/b/a Houdini Lock and Safe Company, and who was traveling behind the Plaintiff's stopped moto vehicle in the parking lot of Auto Zone at or near its intersection with Chews Landing Road in Sicklerville, Winslow Township, Camden County and State of New Jersey.

3. At all relevant times herein, Defendants, John Does, 1 through 100, are fictitious named Defendants who are corporations, entities or individuals whose identities are unknown at present, but who owned, manufactured, leased, maintained, operated, possessed, directed, drove, entrusted, repaired, serviced, supervised or controlled the motor vehicle which was involved in the collision described herein.

4. At the aforescribed time and place, the Defendants, Thomas Guille and/or John Does, 1 through 100, operated their commercial vehicle so carelessly, recklessly, inattentively and who were otherwise negligent so as cause same to come into violent collision with the rear of the Plaintiff's stopped motor vehicle.

5. As a direct and proximate result thereof, the Plaintiff, Brenda Brown, was thrown about violently inside the vehicle and caused to suffer severe and painful bodily injuries which have in the past and will in the future cause her great pain and suffering and have required her to incur medical treatment and expenses and have caused her a diminishment and loss of earning capacity and quality of life and have otherwise caused her injuries which qualify under N.J.S.A. 39:6A including but not limited to permanent loss of use of a body organ, member, function or system; permanent consequential limitation of use of a body organ or member;



significant limitation of use of a body function or system; and which have impaired her from performing her usual activities since the day of this accident.

6. A Certification of Permanency prepared by Plaintiff Brenda Brown's treating orthopaedic surgeon, Thomas Dwyer, M.D. dated June 20, 2022 is annexed to this Complaint as Exhibit A and is incorporated by reference herein.

WHEREFORE, Plaintiff, Brenda Brown, demands judgment against the Defendants, Thomas Guille and John Does, 1 through 100, individually, jointly, separately, and/or in the alternative for damages, interest, costs of suit and such other relief as this Court shall deem fair and just.

## **SECOND COUNT**

1. All of the paragraphs of the First Count of this Complaint are incorporated herein by this reference but for the sake of brevity are not set forth at length.

2. At all relevant times herein, Defendants, Jack Does, 1 through 100, are fictitious named Defendants who are corporations, entities or individuals whose identities are unknown at present, but who were the employers and/or principals of the Defendant, Thomas Guille, who was operating said commercial vehicle in the within accident.

3. At the aforesaid time and place, the Defendants, Thomas Guille and/or John Does, 1 through 100, was operating said commercial vehicle as an agent, servant and/or employee of the Defendants, John's Lock Shop Company d/b/a Houdini Lock and Safe Company and/or Jack Does, 1 through 100, and with the express and/or implied permission of the Defendants, John's Lock Shop Company d/b/a Houdini Lock and Safe Company and/or Jack Does, 1 through 100.

4. At the aforescribed time and place, the Defendants, Thomas Guille and/or John Does, 1 through 100, operated their commercial motor vehicle so carelessly, recklessly,

inattentively and who were otherwise negligent so as cause same to come into violent collision with the rear of the Plaintiff's stopped motor vehicle.

5. The negligence of the Defendants, Thomas Guille and/or John Does, 1 through 100, is therefore imputed against the Defendants, John's Lock Shop Company d/b/a Houdini Lock and Safe Company and Jack Does, 1 through 100.

6. As a direct and proximate result thereof, the Plaintiff, Brenda Brown, was thrown about violently inside the vehicle and caused to suffer severe and painful bodily injuries which have in the past and will in the future cause her great pain and suffering and have required her to incur medical treatment and expenses and have caused her a diminishment and loss of earning capacity and quality of life and have otherwise caused her injuries which qualify under N.J.S.A. 39:6A including but not limited to permanent loss of use of a body organ, member, function or system; permanent consequential limitation of use of a body organ or member; significant limitation of use of a body function or system; and which have impaired her from performing her usual activities since the day of this accident.

7. A Certification of Permanency prepared by Plaintiff Brenda Brown's treating orthopaedic surgeon, Thomas Dwyer, M.D. dated June 20, 2022 is annexed to this Complaint as Exhibit A and is incorporated by reference herein.

WHEREFORE, Plaintiff, Brenda Brown, demands judgment against the Defendants, John's Lock Shop Company d/b/a Houdini Lock and Safe Company and Jack Does, 1 through 100, individually, jointly, separately, and/or in the alternative for damages, interest, costs of suit and such other relief as this Court shall deem fair and just.

VINCENT J. CIECKA, P.C.

/s/ Michael Sussen, Esquire  
MICHAEL SUSSEN, ESQUIRE

**JURY DEMAND**

PLEASE TAKE NOTICE that the Plaintiff hereby demands a trial by jury with respect to the within matter.

VINCENT J. CIECKA, P.C.

/s/ Michael Sussen, Esquire  
MICHAEL SUSSEN, ESQUIRE

**NOTICE PURSUANT TO THE RULES**

TAKE NOTICE that the undersigned attorney, counsel for the Plaintiff(s), hereby demands, pursuant to Rules 1:5-1(a) and 4:17-4(c) that each party herein serving pleadings and interrogatories and receiving answers thereto, serve copies of all such pleadings and answers to interrogatories received from any party upon the undersigned attorney and TAKE NOTICE that this is a continuing demand.

**DESIGNATION OF TRIAL COUNSEL**

PLEASE TAKE NOTICE that pursuant to Rule 4:25-4 of the Rules of Civil Practice, MICHAEL SUSSEN, ESQUIRE is hereby designated as trial counsel on behalf of the law firm of Vincent J. Ciecka, P.C., attorney(s) for the Plaintiffs in the within action.

VINCENT J. CIECKA, P.C.

/s/ Michael Sussen, Esquire  
MICHAEL SUSSEN, ESQUIRE

**NOTICE OF UTILIZATION OF TIME UNIT METHOD  
OF CALCULATING DAMAGES**

Be advised that pursuant to Rule 1:7(b), Plaintiff may utilize the time unit method for calculating damages at the time of Trial.

VINCENT J. CIECKA, P.C.  
/s/ **Michael Sussen, Esquire**  
MICHAEL SUSSEN, ESQUIRE

**NOTICE TO UTILIZE MEDICAL ILLUSTRATIONS**

Plaintiff's experts may utilize medical charts and/or medical diagrams and/or medical illustrations of the affected areas of the body at the time of Trial.

VINCENT J. CIECKA, P.C.  
/s/ **Michael Sussen, Esquire**  
MICHAEL SUSSEN, ESQUIRE

**CERTIFICATION**

I, MICHAEL SUSSEN, of full age, do hereby certify that:

Pursuant to the Rules 4:5-1, to the best of my knowledge, information and belief that the matter in controversy is not the subject of any other action pending in any Court nor of any pending arbitration proceeding, that no other action or arbitration is contemplated and further that there are no other parties who should be joined in this action.

- a) Plaintiffs reserve the right to file an action with Forthright for payment of no-fault benefits, pursuant to the terms of their automobile insurance policy.

VINCENT J. CIECKA, P.C.  
/s/ **Michael Sussen, Esquire**  
MICHAEL SUSSEN, ESQUIRE

DATED: August 25, 2022

# EXHIBIT A

**CERTIFICATION OF TREATING PHYSICIAN AS TO PERMANENCY  
PURSUANT TO AUTOMOBILE COST REDUCTION ACT**

I, Thomas A. Dwyer MD certify as follows:

1. I am a board certified physician in New Jersey & Delaware.  
I am associated with Peninsula Orthopedic Associates of Southern NJ.
2. I treated Brenda Brown as a result of a motor vehicle accident which occurred  
on 10/11/20. Brenda Brown sustained the following  
injuries:  
① Rotator cuff tear left shoulder  
② Medial meniscus tear left knee
3. My certification is based upon my professional expertise and the findings in my reports  
including reference to clinical objective findings and/or objective medical tests, and it is  
my opinion that, within a reasonable degree of medical probability, my patient has  
sustained the above injuries which are permanent and that will have permanent sequella,  
for the balance of her lifetime.
4. It is my understanding that under the New Jersey statute, a permanent injury means a  
body part or organ or both which has not healed to function normally and to medical  
probability will not heal to function normally with further medical treatment. It is with  
this definition in mind that I find that my patient has sustained a permanent injury.

I certify that the foregoing statements made by me are true. I am aware that if any of the  
foregoing medical opinions expressed by me are willfully false, I am subject to punishment as  
outlined in the Automobile Insurance Cost reduction Act.

Dated: 6/20/22



## Civil Case Information Statement

### Case Details: CAMDEN | Civil Part Docket# L-002205-22

**Case Caption:** BROWN BRENDA VS JOHN'S LOCK SHOP, IN C.

**Case Initiation Date:** 08/25/2022

**Attorney Name:** MICHAEL SUSSEN

**Firm Name:** VINCENT J. CIECKA, PA

**Address:** 5709 WESTFIELD AVENUE PENN OAK BUILDING

PENNSAUKEN NJ 08110

**Phone:** 8566655709

**Name of Party:** PLAINTIFF : Brown, Brenda

**Name of Defendant's Primary Insurance Company**  
(if known): None

**Case Type:** AUTO NEGLIGENCE-PERSONAL INJURY (VERBAL THRESHOLD)

**Document Type:** Complaint with Jury Demand

**Jury Demand:** YES - 6 JURORS

**Is this a professional malpractice case?** NO

**Related cases pending:** NO

**If yes, list docket numbers:**

**Do you anticipate adding any parties (arising out of same transaction or occurrence)?** NO

**Does this case involve claims related to COVID-19?** NO

**Are sexual abuse claims alleged by: Brenda Brown?** NO

### THE INFORMATION PROVIDED ON THIS FORM CANNOT BE INTRODUCED INTO EVIDENCE

CASE CHARACTERISTICS FOR PURPOSES OF DETERMINING IF CASE IS APPROPRIATE FOR MEDIATION

**Do parties have a current, past, or recurrent relationship?** NO

**If yes, is that relationship:**

**Does the statute governing this case provide for payment of fees by the losing party?** NO

**Use this space to alert the court to any special case characteristics that may warrant individual management or accelerated disposition:**

**Do you or your client need any disability accommodations?** NO

**If yes, please identify the requested accommodation:**

**Will an interpreter be needed?** NO

**If yes, for what language:**

**Please check off each applicable category: Putative Class Action?** NO **Title 59?** NO **Consumer Fraud?** NO

I certify that confidential personal identifiers have been redacted from documents now submitted to the court, and will be redacted from all documents submitted in the future in accordance with *Rule 1:38-7(b)*

08/25/2022  
Dated

/s/ MICHAEL SUSSEN  
Signed





# EXHIBIT B

Attorneys for Defendants, John's Lock Shop, Inc. d/b/a Houdini Lock and Safe Company and Thomas Guille

**VIA ECOURT FILING**

Camden County Clerk of the Superior Court of New Jersey, Law Division, in accordance with 28  
U.S.C. § 1446.

**WILSON, ELSER, MOSKOWITZ, EDELMAN & DICKER LLP**  
Attorneys for Defendants, John's Lock Shop, Inc. d/b/a Houdini Lock and  
Safe Company and Thomas Guille

By: /s/ Andrew J. Heck  
Andrew J. Heck

Dated: September 20, 2022

**CERTIFICATE OF SERVICE**

I hereby certify that on behalf of Defendants, John's Lock Shop, Inc. d/b/a Houdini Lock and Safe Company and Thomas Guille, I caused the within Notice of Filing of Removal to be served via Electronic Filing, upon:

Clerk  
New Jersey Superior Court  
Camden County Hall of Justice  
101 S. 5th St.  
Camden, NJ 08103

Michael Sussen, Esq.  
Vincent J. Ciecka, PC  
P.O. Box 560  
5709 Westfield Avenue  
Pennsauken, NJ 08110  
Attorneys for Plaintiff

I further certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

**WILSON, ELSER, MOSKOWITZ, EDELMAN & DICKER LLP**  
Attorneys for Defendants, John's Lock Shop, Inc. d/b/a Houdini Lock and  
Safe Company and Thomas Guille

By: /s/ Andrew J. Heck  
Andrew J. Heck. (11802012)  
[Andrew.Heck@wilsonelser.com](mailto:Andrew.Heck@wilsonelser.com)

Dated: September 20, 2022

# EXHIBIT A

**WILSON ELSE MOSKOWITZ EDELMAN & DICKER, LLP**

Andrew J. Heck, Esq. (AH9361)

Christopher W. McClanahan, Esq. (CM6972)

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Attorneys for Defendants, John's Lock Shop, Inc. d/b/a Houdini Lock and Safe Company and Thomas Guille

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

**CAMDEN**

\_\_\_\_\_  
BRENDA BROWN,  
  
Plaintiff,

v.

JOHN'S LOCK SHOP, INC., d/b/a HOUDINI  
LOCK AND SAFE COMPANY, THOMAS  
GUILLE, JOHN DOES, 1 through 100,  
inclusive, fictitious named Defendants and JACK  
DOES, 1 through 100, inclusive, fictitious named  
Defendants jointly, severally and/or in the  
alternative,  
  
Defendants.

: Civil Action No.  
: Hon. \_\_\_\_\_

:  
:  
: Civil Action

**NOTICE OF REMOVAL OF A  
CIVIL ACTION**

TO: THE JUDGES OF THE UNITED STATES DISTRICT COURT FOR THE DISTRICT  
OF NEW JERSEY:

**PLEASE TAKE NOTICE**, that pursuant to 28 U.S.C. § 1446(a), Defendants, John's Lock Shop, Inc. d/b/a Houdini Lock and Safe Company and Thomas Guille (hereinafter "Defendants"), by and through the undersigned attorneys, Wilson Elser Moskowitz Edelman & Dicker, LLP, on this date have filed this Notice of Removal of a Civil Action from the Superior Court of New

Jersey, Law Division, Camden County, Docket No. CAM-L-2205-22, to the United States District Court for the District of New Jersey, together with all process, pleadings, and Orders, as required by 28 U.S.C. § 1446(a), copies of which are attached hereto and made part hereof, respectfully shows:

1. Plaintiff, Brenda Brown (hereinafter, “Plaintiff”), filed a Complaint on August 25, 2022, (the “Complaint”), commencing a personal injury action in the Superior Court of New Jersey, Law Division, Camden County, Docket No. CAM-L-2205-22, entitled *Brown v. John’s Lock Shop, Inc., et al.*, (the “Action”). A true and correct copy of Plaintiff’s Complaint is annexed hereto as **Exhibit A**.

2. The Complaint names John’s Lock Shop, Inc. d/b/a Houdini Lock and Safe Company, and Thomas Guille as defendants (Exhibit A).

3. The Action is alleged to arise out of an October 11, 2020 motor vehicle accident involving Plaintiff and Defendant, Thomas Guille, acting as the agent, servant and/or employee with the express and/or implied permission of its owner, Defendant John’s Lock Shop, Inc. d/b/a Houdini Lock and Safe Company, which caused Plaintiff to sustain bodily injuries (Exhibit A).

4. According to the Complaint, Plaintiff, Brenda Brown, is a resident of the State of New Jersey (Exhibit A).

5. Defendant, Thomas Guille, is an individual and a resident of the State of Pennsylvania.

6. Defendant John’s Lock Shop, Inc. d/b/a Houdini Lock and Safe Company is a Pennsylvania corporation, with a principal place of business in Abington, Pennsylvania.

7. For purposes of diversity jurisdiction, a corporate party is a citizen of both its state of incorporation and the state in which its principal place of business is located. *Hertz Corp. v. Friend*, 559 U.S. 77 (2010).

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15. Defendants have also filed copies of this Notice with the Clerk of the Superior Court of New Jersey, Law Division, Camden County, to perfect the removal of this action to the



United States District Court pursuant to 28 U.S.C. § 1441 and U.S.C. § 1446(b). A true and exact copy of the Notice of Filing, without exhibits, filed with the Superior Court of New Jersey is annexed hereto as **Exhibit B**.

**WHEREFORE**, Defendants pray that given that the statutory requirements having been met, that the above-captioned action now pending in Superior Court of New Jersey, Law Division, Camden County, be removed therefrom to this Court.

**WILSON, ELSER, MOSKOWITZ, EDELMAN & DICKER LLP**  
Attorneys for Defendants, John's Lock Shop, Inc. d/b/a Houdini Lock and  
Safe Company and Thomas Guille

By: /s/ Andrew J. Heck  
Andrew J. Heck. (AH9361)  
[Andrew.Heck@wilsonelser.com](mailto:Andrew.Heck@wilsonelser.com)

Dated: September 20, 2022

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Clerk, United States District Court  
Mitchell H. Cohen Building & U.S. Courthouse  
4th & Cooper Streets Room 1050  
Camden, NJ 08101

I further certify that a copy was sent via Electronic Filing to:

Clerk  
New Jersey Superior Court  
Camden County Hall of Justice  
101 S. 5th St.  
Camden, NJ 08103

Michael Sussen, Esq.  
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Attorneys for Plaintiff

I further certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

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Attorneys for Defendants, John's Lock Shop, Inc. d/b/a Houdini Lock and  
Safe Company and Thomas Guille

By: /s/ Andrew J. Heck  
Andrew J. Heck. (AH9361)  
[Andrew.Heck@wilsonelser.com](mailto:Andrew.Heck@wilsonelser.com)

Dated: September 20, 2022